

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF NORTH CAROLINA**

FARHAD AZIMA,

Plaintiff,

v.

NICHOLAS DEL ROSSO and VITAL
MANAGEMENT SERVICES, INC.,

Defendants.

No. 1:20-cv-00954-WO-JLW

**REPLY IN SUPPORT OF NON-PARTY DECHERT LLP'S
MOTION FOR LEAVE TO FILE AND MOTION TO QUASH SUBPOENA
SERVED ON DECHERT LLP'S BANK, HSBC**

This Court presently is adjudicating "two threshold issues regarding the scope of discovery []: (1) the temporal scope of discovery; and (2) the substantive scope of discovery." D.E. 233 at 6. The Court's threshold determination of the proper scope of discovery bears as directly on the HSBC Subpoenas¹ as it does on discovery sought from Dechert or other parties. Plaintiff does not contend otherwise. Because there is no reason discovery of law firm bank transactions—which reveal confidential information about the attorney-client relationship²—should be broader than that the Court finds proportional to

¹ Plaintiff contends "There is only one HSBC Subpoena." D.E. 240 at 1 n.*. But, as previously explained, the Second HSBC Subpoena contains a new request not present in the First HSBC Subpoena. D.E. 239 at 2.

² Plaintiff conflates confidentiality and privilege. Dechert owes independent duties to protect both. D.E. 238 at 2.

the case, the Court should quash the HSBC Subpoenas to the extent they exceed such bounds.³

Respectfully submitted this the 23rd day of June, 2023.

By: /s/ John C. Quinn

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³ Contrary to Plaintiff's assertion, Dechert does not seek to "thwart the production of *all* documents from HSBC." Cf. D.E. 240 at 1 (emphasis in original). Dechert simply seeks to ensure any production of law firm records is consistent with the Court's forthcoming guidance on the proper scope of discovery.

WORD COUNT CERTIFICATION

Pursuant to Local Rule 7.3(d)(1), I hereby certify that this brief does not exceed the 3,125-word limitation for such briefs, according to the word count feature of the word processing system used to prepare the brief.

Respectfully submitted this the 23rd day of June, 2023.

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